

000027186

CORRES. CONTROL  
OUTGOING LTR NO.**EG&G ROCKY FLATS**

E ORDER# 1200-1

Y RF 09467

EG&amp;G ROCKY FLATS, INC.

ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

DIST.	LTR	ENC
BARAL, M.E.		
BURLINGAME, A.H.		
BSBY, W.S.		
BANCH, D.B.		
BARNIVAL, G.J.		
BVIS, J.G.		
BRRERA, D.W.		
BAY, R.E.		
BIS, J.A.		
BOVER, W.S.		
BLAN, P.M.		
BNNI, B.J.		
BARMAN, L.K.		
BALY, T.J.		
BDAHL, T.	X	
BIG, J.G.		
BITCHINS, N.M.		
BKSON, D.T.		
BLL, R.E.		
BESTER, A.W.		
BAX, G.E.		
BONALD, M.M.		
BKENNA, F.G.		
BONTROSE, J.K.		
BORGAN, R.V.		
BOTTER, G.L.		
BZUTO, V.M.		
BING, T.L.		
BNDLIN, N.B.		
BHWARTZ, J.K.		
BLOCK, G.H.		
BWART, D.L.		
BIGER, S.G.	X	
BIN, P.M.		
BORHEIS, G.M.		
BSON, J.M.		
BLOUSE, L	X	
BUCI, J	X	
BAND, T		
B		
BINGLE, D	X	
B/c	X	
BRES, CONTROL	X	X
BMIN RECORD/0802		
BFFIC		
BTS/T130G		

September 15, 1994

94-RF-09467

F. R. Lockhart  
Environmental Restoration Division  
DOE, RFFO

COMMENTS ON DRAFT MAJOR ACTIVITY DOCUMENT OPERABLE UNIT 4 (OU 4)  
- SRK-194-94

Ref: Memorandum, ER:RFL:09295

Ref: Plant Action Tracking System (PATs) Item #03474RF94

Action: None required

It is my understanding that per the Draft Majority Activity Document (MAD) review held on September 9, 1994, the comments in the referenced Memorandum have been addressed to your satisfaction. One comment, to transfer scope of work of waste storage operations, was handled by an asterisk and a note as EM 30 Rocky Flats Field Office (RFFO) has not concurred with your direction. We await final concurrence and direction from RFFO on this issue. It is EG&G's recommendation that the affected work package be moved in its entirety to the appropriate waste management MAD.

Should you disagree, please contact me as soon as possible, on extension 8541.

*S. R. Keith*  
S. R. Keith  
Program Manager  
Solar Pond Projects

Enclosure:  
As Stated

SRK:clh

Orig. and 1 cc - F. R. Lockhart

S. Howard - DOE, RFFO  
M.A. Witherill - " "

CLASSIFICATION:

UNCLASSIFIED	
CONFIDENTIAL	
SECRET	

AUTHORIZED CLASSIFIER  
SIGNATURE

TE

REPLY TO RFP CC NO:

ACTION ITEM STATUS

PARTIAL/OPEN

CLOSED

APPROVALS:

G &amp; TYPIST INITIALS

ADMIN RECORD

1101-A90071

CORRES. CONTROL  
INCOMING LTR NO.

03473 RF 94 States Government

DUE  
DATE 10-7-94

ACTION *Stiger*

DIST.	LTR	ENC
BURLINGAME, A.H.		
BUSBY, W.S.		
CARNIVAL, G.J.		
CORDOVA, R.C.		
DAVIS, J.G.		
FERRERA, D.W.		
FRAY, R.E.		
GEIS, J.A.		
GLOVER, W.S.		
GOLAN, P.M.		
HANNI, B.J.		
HEALY, T.J.		
HEDAH, T.G.		
HILBIG, J.G.		
HUTCHINS, N.M.		
JACKSON, D.T.		
KELL, R.E.		
KUESTER, A.W.		
MARX, G.E.		
McDONALD, M.M.		
McKENNA, F.G.		
MORGAN, R.V.		
PIZZUTO, V.M.		
POTTER, G.L.		
SANDLIN, N.B.		
SATTERWHITE, D.G.		
SCHUBERT, A.L.		
SCHWARTZ, J.K.		
SETLOCK, G.H.		
STIGER, S.G.		
TOBIN, P.M.		
VOORHEIS, G.M.		
WILSON, J.M.		

# memorandum

SEP 1 1994

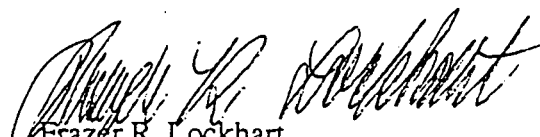
~~ER-RFL-09295~~

Review of Draft Major Activity Document for Operable Unit No. 4

Steve R. Keith  
Program Director, Solar Pond Project  
EG&G Rocky Flats, Inc.

I have reviewed the draft Major Activity Document (MAD) for Operable Unit No. 4, Solar Ponds, for FY95. In general the MAD is good and reflects the expected workscope. There are several important comments that should be addressed in the MAD or subsequent Work Packages. These documents are listed on the attachment.

Please contact me at extension 7846 if you have any further questions.

  
Frazer R. Lockhart  
Director, Environmental Restoration  
Major System Acquisition

*Keith, S.R.* X X

*Hollowell, L.* X X

cc:  
J. Roberson, AMER, RFFO  
D. Ruscitto, AMOWM, RFFO  
H. Rose, ER, RFFO

CORRES. CONTROL	X	X
ADMN RECORD/080	X	2
PATS/T130G	X	X

Reviewed for Addressee  
Corres. Control RFP

9-8-94 *quo*  
DATE BY

Ref Ltr. #

DOE ORDER # 5400.1

SEP 3 3 1994

SEP 1 2 1994

Department of Energy  
Rocky Flats Field Office

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94-RF-09467  
Page 1 of 11

ACTION ITEM

# 03473 PF94

From: DOE

Date: 9/12

Date of correspondence: 9/1

The following Action is assigned to:

Keith

With a response date no later than: 10/7

**Comments/Notes:** Please indicate acceptance or nonacceptance of responsibility for this commitment and return this form to: L. Hollowell R/IM, within 24 hours of date assigned. If no response within 24 hours, the responsibility for the action defaults to the individual listed.

☒ I ACCEPT responsibility for the above commitment ARK 9-12-94  
Initial date

☐ I DO Not accept responsibility for the above commitment because:

I believe this commitment is the responsibility of: \_\_\_\_\_

Initial date

Closure Approved: \_\_\_\_\_

3/12

3473 RF 94

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SEP 1 1994


ER:RFL:09295

## Review of Draft Major Activity Document for Operable Unit No. 4

Steve R. Keith  
Program Director, Solar Pond Project  
EG&G Rocky Flats, Inc.

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Please contact me at extension 7846 if you have any further questions.

  
Frazer R. Lockhart  
Director, Environmental Restoration  
Major System Acquisition

cc:  
J. Roberson, AMER, RFFO  
D. Ruscitto, AMOWM, RFFO  
H. Rose, ER, RFFO

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Wenth

Hollowell

Enclosure 1  
94-RF-09467  
Page 3 of 11

Department of Energy  
Rocky Flats Field Office

[illegible]

RES. CONTROL	X	X
MAN RECORD/080	X	X
TS/T130G	X	X

Reviewed for Addressee  
Corres. Control RFP

7-8-94 *Qno*  
DATE BY

: Lit. F

DE ORDER # 5400.1

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Attachment  
ER:FRL:09295

COMMENTS TO DRAFT FY95 MAD FOR OU4, SOLAR PONDS

- 1) The following three elements of scope should be eliminated from the OU4 MAD and shifted to a MAD in the Waste Management subprogram: "Complete repack and restack operations to bring the 904 Pad into RCRA compliance for aisle spacing. Continue RCRA inspections for stored waste on the 750 and 904 pads. Maintain the 750 and 904 pad facilities in a safe condition." The justification for moving these scope elements is for consistency with the EM30/40 MOU which places EM-30, Waste Management, in the role of managing wastes for storage and disposal. This standard waste management role was revised for the 750 and 904 pads and associated pondcrete and saltcrete in FY92 because of the impending startup of the Environmental Restoration Haliburton process which would address both waste forms. The future plan for pondcrete disposition has been revised such no processing for pondcrete is expected, and therefore continued daily management of these wastes by Environmental Restoration is unwarranted and inconsistent with Rocky Flats Environmental Technology Site and DOE practice. Under the terms of the EM-30/40 MOU Environmental Restoration would expect to pay for the costs of the storage.
- 2) The Work Packages should clarify the element, "Maintain the Building 910 evaporators in stand-by condition ready to operate if needed...". The DOE intent and desire is that B-910 be available to startup and become operational on approximately 60 days notice. We do not intend to budget for a higher state of readiness.
- 3) Work packages developed for the elements, "Complete the IM/IRA Decision Document, the 90% Title II Design, the Implementation Plan..." and "Commence construction of the 1,000 year engineered barrier in late FY95" should incorporate the concept that both sludge and existing pondcrete will be incorporated under the engineered barrier as part of the closure. Consistent with this, Work Package tasks which address further technology development or treatability work for processing of sludge or reprocessing of pondcrete should be curtailed. EG&G is advised that these technology development/treatability tasks may have value in waste management or other areas of the environmental restoration program, therefore coordination should be made with those potential users to see if they are willing to support continued funding of the tasks.
- 4) Work Package development to support finalization of the IM/IRA Decision Document should include provision for a search of similar closures within Colorado and the Denver area. Of specific interest is the types and levels of radioactive contamination allowed to remain at other closures/cleanups and the standards imposed or met for radionuclides in soils and groundwater. Sites to investigate at a minimum include the Lowry Landfill, Denver Radium sites, and UMTRA sites.

5/12

ER-FRL:09295

- 5) A major milestone should be added for the start of IM/IRA construction during the 4th quarter of FY95. I would expect this date to be sometime in late August or September 1995.
- 6) The Colorado Hazardous Waste Act should be added as a regulatory driver. CERCLA should also be added as a regulatory driver.
- 7) The interdependency statement should be revised to reflect the shift of 750 and 904 pads daily management and oversight to waste management. We would then be reimbursing waste management according to the agreed ratio, rather than waste management reimbursing environment restoration to manage their waste.
- 8) Pondcrete being minimally treated and disposed of under the engineer cap should be added as an assumption.
- 9) The assumption regarding Treatability operations in Tent 6 or Tent 2 appears unneeded, as the treatability study is unneeded (unless funded outside of OU4).
- 10) The assumption regarding disposal of saltcrete should be removed from the OU4 MAD. This becomes an issue for a waste management MAD.
- 11) The assumption for keeping B-910 on standby in FY95 should be clarified to further define "standby" as ready to operate within 60 days.

ROCKY FLATS SITE  
MAJOR ACTIVITY DOCUMENT (MAD)

MAJOR ACTIVITY: CAD - OU#4 SOLAR PONDS

SUBPROGRAM: CA - REMEDIAL ACTION

FUNDS SOURCE: HQ PROGRAM OFFICE: EM40

B&R CODE: EW20102 ADS NO: 1258

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1. SCOPE - FY95

Develop a new treatment facility based on the current disposal strategy and waste acceptance criteria and determine the methodology to be used to minimally treat each existing waste form. Sludge and pondcrete are to be minimally treated and disposed of under the engineered barrier. Complete the IM/IRA Decision Document, the 90% Title II Design, the Implementation Plan, and the Post Closure Performance Monitoring Plan. Perform pre-construction activities prior to installation of an engineered barrier over the Solar Ponds to include: removal of cement silos located near Building 788 and removal of structural steel framing on west side of Building 788; removal of excess material within the Solar Pond area; installation of a vehicle access gate at Portal #3; relocation of cargo containers at Building 964; and general site improvements such as removal and relocation of existing utility lines, installation of construction fence and construction trailers, removal and re-routing of the above ground transfer line, and placement of a support area. Commence construction of the 1,000 year engineered barrier. Maintain the Building 910 evaporators in stand-by condition ready to operate in approximately 60 days if needed, maintain the Interceptor Trench System (ITS) and main sump in operation to control surface and sub-surface runoff from the solar ponds area; maintain the the Modular Storage Tanks at a safe level and pump water to Building 374 for processing; schedule and monitor relocation of above ground transfer line to Building 374 to provide uninterrupted service; and provide all required RCRA inspections and records on Building 910, the main sump, and the Modular storage tanks. Complete removal of sludge from Pond 207C and Clarifier.

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**ROCKY FLATS SITE  
MAJOR ACTIVITY DOCUMENT (MAD)**

MAJOR ACTIVITY: CAD - OU#4 SOLAR PONDS

**2. BASELINE FUNDING - FY95 (\$000)**

<u>Rev/ Date</u>	<u>B&amp;R Code</u>	<u>FY94 Uncosted B/A</u>	<u>FY95 New B/A</u>	<u>FY95 Total B/A</u>	<u>Encumb. Res.</u>	<u>Mgmt. Res.</u>	<u>BCWS</u>
0-10/1	EW2010201			7,744			
0-10/1	EW2010204			<u>28,256*</u>			
	TOTAL			36,000			

\* Per F.R. Lockhart, Work Package 12153, Waste Storage, will be moved to a Major Activity in the Waste Management Subprogram. This equates to \$6,343K and is not reflected in the above numbers.

**3. MILESTONES - FY 95 (1 = Regulatory, 2 = DOE-HQ, 3 = RFFO)**

<u>Major Milestone</u>	<u>Type</u>	<u>Work Package</u>	<u>Rev.</u>	<u>Date</u>
a. All Solar Ponds Empty	1	12187		Jan 20, 95
*b. Submit Proposed Phase I IM/IRA	1	12162		Jan 26, 95
*c. Submit Draft Responsiveness Summary	1	12162		Jun 5, 95
*d. Submit Final IM/IRA Title II Design	1	12181		Jun 20, 95
*e. Submit Final IM/IRA Responsiveness Summary	1	12162		Jul 24, 95
*f. Commence Remediation Construction	1	12181		Sep 27, 95

\* These proposed/IAG milestone dates are currently being negotiated under the Dispute Resolution Process.

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**ROCKY FLATS SITE  
MAJOR ACTIVITY DOCUMENT (MAD)**

MAJOR ACTIVITY: CAD - OU#4 SOLAR PONDS

**4. DRIVERS (Type: R = Regulatory, D = DOE Orders/Guidance)**

<u>Driver</u>	<u>Type(s)</u>	<u>Description of driver/MA relationship</u>
a. Interagency Agreement (IAG)	R	IAG Milestones
b. RCRA	R	Legal provisions
c. CERCLA	R	Legal provisions
d. National Environmental Policy Act (NEPA)	R	Legal provisions
e. Colorado Hazardous Waste Act	R	Legal provisions
f. DOE 4700.1	D	Manage Subproject as a Major System Acquisition
g. DOE 5840.19	D	Conduct of Operations

**5. INTERDEPENDENCIES TO OTHER MA(s)**

This Major Activity is interdependent with Major Activities ABA, ACA, and ABD. The interdependencies with Major Activity ABA is (1) completion of the centralized waste storage facility as waste may need to be moved there to make room for processing solar pond waste streams and to store current production of saltcrete, and (2) the storage function for the 750 and 904 pads which must meet the needs of Solar Ponds for space to process. The interdependence with Major Activity ACA is the upgrade of the Building 374 Saltcrete Processing to produce certifiable saltcrete to facilitate immediate offsite shipping and disposal to alleviate waste storage capacity. The interdependence with Major Activity ABD is with the shipping of LDR compliant saltcrete to make room for processing.

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**ROCKY FLATS SITE  
MAJOR ACTIVITY DOCUMENT (MAD)**

MAJOR ACTIVITY: CAD - OU#4 SOLAR PONDS

**6. ASSUMPTIONS, ISSUES, UNCERTAINTIES:**

- Budget planning is based on the accelerated cleanup ER 2000 accelerated cleanup plan.
- Sludge and inventoried pondcrete are to be minimally treated and disposed of under the engineering cap. Full impact of this scope change has not been fully assessed. In addition, these impacts to IAG milestones are in negotiation with the regulators. Impacts will be handled through the change system.
- DOE, EPA, CDPHE, and the public will accept the IM/IRA DD resolution for sludge and pondcrete placement under the engineered barrier. Regulators will approve the disposal of Building 788 D&D wastes under the cap.
- Ponds will be clean and dry prior to the January 20, 1995 IAG milestone completion date.
- DOE will seek adjustment of the applicable IAG milestones in the event that the remediation method/system used for planning the baseline is rejected by the regulators or the public or is otherwise not implemented.
- Organizations external to EG&G will complete their activities in accordance with the schedule. Examples are: DOE will complete the NEPA process before equipment is ready to be ordered; the Colorado Department of Public Health and Environment (CDPHE) will grant the permit changes in a timely manner; DOE RFFO/HQ will approve BCPs in a timely manner.
- Rocky Flats Environmental Technology Site (RFETS) Environmental Restoration Program (ER) will continue to be managed as a DOE Major System Acquisition (MSA).
- The present level of documentation and reporting will not change significantly through the course of the year.
- Local plant procedures and policies will remain as they are. Implementation of new procedures or major modifications to existing procedures and policies may adversely impact schedule and cost baselines.
- The existing Davis-Bacon "covered" determination for the construction activities will not change.
- Design and procurement durations associated with sludge treatment are based on Safety Category III, Quality Level III, and system classification.
- The IM/IRA milestone date for start of construction (closure) of OU4 is September 27, 1995.

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**ROCKY FLATS SITE  
MAJOR ACTIVITY DOCUMENT (MAD)**

**MAJOR ACTIVITY: CAD - OU#4 SOLAR PONDS**

- DOE will provide transmittal authorization and action for the various deliverables.
- Laboratory turnaround times for radionuclides will not exceed 42 working days/ two calendar months.
- Remediation Conceptual Design, Title II Design & Engineering and Title III Design will be performed by Master Task Subcontract (MTS). Engineering and Project Management (E&PM) will review all design and engineering products.
- HNUS will be sole sourced as the Conceptual Design and Treatability MTS subcontractor. Title II, III, and startup assistance will be awarded through the A-E MTS subcontract vehicle. Waste Certification and Onsite Transportation are an EG&G responsibility.
- The minimal treatment of pondsludge and pondcrete will be performed on the 750 Pad and/or 904 Pad. Space will be made available by shipping LDR compliant saltcrete to Envirocare, moving waste to the new centralized waste storage facility, or some other location.
- One process train will be constructed to process both C Pond/Clarifier and A/B Pond sludges. This equipment will be located in the vicinity of the 750 Pad. A crushing system, at minimum, will be required for pondcrete processing.
- EnviroCare will be the waste disposal site for the wastes generated during pond closure (and not placed under the engineered barrier) and will be available per the closure schedule; no new storage areas are needed at Rocky Flats for this material.
- IHSS 176 will be annexed as part of OU 4 closure.
- Initial issue of the Decision Document (DD) does not include the C-Pond and B-South Pond Remedial Investigation. The C-Pond and B-South Pond Remedial Investigation will be included through amendment of the IM/IRA when available and is excluded from the deliverable-commitments for the IAG.
- A Corrective Action Management Unit (CAMU) is granted by allowing soils on the edge of Pond 207C to be excavated and placed under the cap without treatment to comply with Land Disposal Restrictions.
- The DOE will concur with and approve the hazard classification of the remediation of OU4 to be Category III.
- No more than 17 sets of samples will be taken at random for full Technical Contract Lab Protocol (TCLP) testing for certification purposes.

**ROCKY FLATS SITE  
MAJOR ACTIVITY DOCUMENT (MAD)**

**MAJOR ACTIVITY: CAD - OU#4 SOLAR PONDS**

- The methodology for conducting Baseline Risk Assessments at Rocky Flats will be agreed upon by DOE, EPA and CDHE no later than October 1, 1994.
- Building 374 will be utilized for all Interceptor Trench System (ITS) water processing. Building 910 would be kept on standby (activation possible within approximately 60 days) through FY95 and put into long term shutdown in FY96.
- Removal of liners and soil offsite will not be required for pond partial closure, though some minimal consolidation of these materials within the pond IHSS may occur.
- RFETS building related work scope will be in agreement with RFETS Strategic Planning and/or will be discussed with and approved by the Transition Planning organization.
- The scope of NEPA activities for Phase I remediation will be an Environmental Assessment only (an Environmental Impact statement will not be required).
- No endangered species of plants or animals will be discovered that impact the schedule.
- The stabilized sludge and pondcrete waste product must meet waste acceptance criteria of Performance standards as defined in the IM/IRA DD. FO39 analyte listing will not be required.
- EPA/CDPHE review durations for the Baseline Risk Assessment (BRA) Technical Memorandums will not exceed 10 working days.
- The DOE, EPA, and CDPHE will provide conditional/unconditional approval of the OU 4 Phase II RFI/RI Work Plan prior to commencing field closure activities.

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**7. SCREENING/PRIORITIZATION PROCESS RESULTS:**

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**8. MAJOR ACTIVITY BASELINE APPROVAL/CHANGE CONTROL:**

Revision  
0

Date  
10/1/94

RFFO  
RFFO MA Mgr.

M&O  
EG&G MA Mgr.

12/12